

## **Appendices**

Appendix A: PrintSTEP Evaluation Strategy

Appendix B: Telephone Survey Instruments for Printers

Appendix C: PrintSTEP Application Template

Appendix D: Telephone Survey Instrument for Community Members

Appendix E: Federal Register Notice

Appendix F: Fax-back Form for Cost Information

Appendix G: Report Outline

# **Appendix A:**

## **PrintSTEP Evaluation Strategy**

# **EVALUATION STRATEGY FOR THE PrintSTEP PILOT PROJECTS**

## **DRAFT<sup>1</sup>**

### **OVERVIEW OF THE APPROACH**

The evaluation of the PrintSTEP pilot program aims to systematically identify the impacts the program has had on three types of stakeholders: printers, community residents, and the state government agencies administering the program. We want to know: what difference has PrintSTEP made to each of these three types of stakeholders? Ultimately, this will help determine whether or not to go forward with full implementation of the program in all states. In the process of doing so, improvement measures for the program can be put in place.

Because PrintSTEP is a multifaceted program, it has a variety of goals. The PrintSTEP Project Team has identified seven types of expected outcomes, each of which has several component parts.

- ▶ enhanced environmental protection;
- ▶ increased use of pollution prevention practices;
- ▶ simplified regulatory process for printers;
- ▶ improved efficiency of administration for state governments;
- ▶ enhanced public involvement;
- ▶ participants realize benefits and are motivated to participate in PrintSTEP; and
- ▶ cost effectiveness for all stakeholders.

This broad set of expected outcomes will require a range of distinct data collection and analysis activities. Data will be gathered from printer's program applications and telephone interviews. Data will be collected before implementation, a short time after program implementation, and at the end of the pilot. A key feature of the recommended design is the use of a comparison group of printers as a tool for gauging the impact of the PrintSTEP program.

The evaluation design will have two main products: an Interim Report and Final Evaluation Report. The Interim Report would be based on data collected approximately one year after program implementation, focusing on the experiences of printers, the community and state agency staff with the initial implementation of the program. Additional Interim Reports may be produced during the evaluation, as required by EPA. The Final Report would be based primarily on a comparison of pre-implementation data with data collected after approximately two years of program operations from printers, community residents, and state agencies. The Final Report would address the program's impacts on all seven of the outcomes identified above.

---

<sup>1</sup> This Strategy is expected to remain draft until several factors become known, including the budget for the evaluation, and how many printers and community members will be involved in the pilots.

Section One of this document describes the rationale underlying the recommended program evaluation strategy. Section Two identifies the data collection activities necessary to support the program evaluation. Section Three provides a preliminary schedule for program evaluation activities. Finally, Section Four discusses each of the seven outcome domains in greater detail, identifying the specific information required and the proposed methods for collecting the information.

## **SECTION ONE: RATIONALE FOR THE RESEARCH DESIGN**

The overall design of the evaluation is driven by the need to know what difference the program has made. For the PrintSTEP program, the best way to identify program impacts is a “double difference” design, i.e., one that employs both a comparison of data collected before and after implementation and also a comparison of data on participating printers and non-participating printers. To truly evaluate the impact of the PrintSTEP program, one would like to be able to say that PrintSTEP **caused** the changes that are seen when pre-implementation data is compared to post-implementation data. Without a comparison group, the study would be vulnerable to the criticism that any observed changes are the result of something other than the PrintSTEP program, such as the market demand for specific types of printing services, the cost of materials used in production, or the larger social and political context. Collecting information about both participating printers and a comparison group of printers allows us to control for certain “confounding” factors that might undermine our ability to attribute observed changes to the program. This will allow the study to make the strongest case it can that the PrintSTEP program did or did not have specific program impacts, such as increasing the use of pollution prevention techniques or increasing the level of public involvement.

Constructing a valid comparison group of printers must be done with great care, to avoid introducing bias into the analysis. For instance, if printers enter the PrintSTEP program because they are making an investment in new equipment and will need to modify their existing permits, a comparison with printers who are not making similar investments may be biased. The printers that are not investing in their equipment are more likely to be using older, more polluting production techniques. The intention is that the comparison group of printers will resemble the participating printers in a number of important respects. The printers should be of comparable size, use comparable printing technologies, and be subject to similar pre-implementation regulatory requirements. To recruit the comparison group, the three pilot state coordinators (in New Hampshire, Minnesota, and Missouri) will be working with the printing trade associations in the state. In Minnesota and Missouri, PrintSTEP is being piloted only in specific geographic areas (St. Cloud and St. Louis, respectively). The comparison group will be drawn from the non-PrintSTEP areas of the state. Through the trade associations, every effort will be made to recruit comparison group printers who would participate in PrintSTEP if it were available in their area. This will eliminate the most critical area of bias: that related to printers’ motivation. In New Hampshire, PrintSTEP will be implemented state-wide. The New Hampshire PrintSTEP coordinator will work with the printing trade associations to recruit a comparable comparison group.

Use of a comparison group approach will help the evaluation gain considerable leverage on the analysis

of key outcomes. For instance, we will compare the public involvement experience of printers participating in the PrintSTEP process with the public involvement experience in the regulatory process for the comparison group of printers. Additionally, we will compare costs to the state related to participating and non-participating printers.

## **SECTION TWO: DATA COLLECTION ACTIVITIES**

Data for the evaluation study will be gathered in a variety of ways.

- ▶ Telephone survey of printers (including participating printers and a comparison group of printers);
- ▶ Printer application forms and an application-equivalent for the comparison group;
- ▶ In-person interviews with state agency staff;
- ▶ State-agency data; and
- ▶ Telephone survey of community residents.

### **Printers: Telephone Survey and PrintSTEP Application Forms**

It is critical to the evaluation to understand how printers view the PrintSTEP program, how the costs of participating compare to the costs of not participating, and what changes participating printers have made as a result of their participation in the program. Both participating and non-participating printers will be interviewed three times: before the program is implemented, at an early point in implementation, and at the end of the pilot. The Baseline survey establishes a starting point against which subsequent measures can be compared. The Interim survey would collect information on the printers' opinions about the initial application process and about the costs they incurred as part of that process. This information is likely to be more accurate if collected at an interim point than it would be if it were collected at the end of the pilot. The Post-pilot survey would focus primarily on changes to the production process and measures of environmental impact, areas where any impacts are not likely to be fully evident earlier in the program.

Telephone surveys, combined with written information from the PrintSTEP application (or application-equivalent for the comparison group), will be used to collect this information. The PrintSTEP application form and their annual updates will be used to provide data on environmental releases before and after pilot implementation. The application template as it appears in the *Plain Language Workbook* may be modified to capture the relevant data, and printers will complete it at the time of application and update it annually. Information on costs incurred related to PrintSTEP or environmental regulation will be collected via a fax-back form that will be sent to the printer at the completion of the telephone interview.

By way of background, in order to help identify the universe of printers who may ultimately be subject

to the evaluation, the PrintSTEP pilot coordinators in MN and NH plan to send a questionnaire to printers in the pilot implementation areas. If a printer decides to voluntarily complete the questionnaire, he/she will be asked to provide the following information: company name, contact person, mailing address, facility address, type of printing process operated, type of printing jobs, and whether or not the printer would possibly be interested in joining PrintSTEP. A space for comments will be included. The questionnaire will be printed as a tri-fold with postage-paid return address. The PrintSTEP coordinators for these pilot states will receive the responses and will use them to build and/or enhance their database of potentially interested printers, who may be subject to the evaluation.

### **State Agency: In-person Interviews and State Agency Data**

The critical outcomes expected from state and other regulatory authorities are measures of efficiency: how well the agency is able to coordinate to accomplish multi-media tasks concurrently, how much time the paper work and processing takes, and what the resulting costs will be. Our recommended approach is to conduct in-person interviews with government personnel at the baseline, at an interim point and at the end of the pilot. Questions about time and costs will be asked at all three times, but questions about the organization and multi-media office coordination will only be asked at the end. Comparison data will be collected from state agency staff who will be processing permits for the comparison group of printers.

In-person interviews are recommended as the preferred method to collect this information. The states have a more varied set of objectives for PrintSTEP, including outcomes at their own agency, as well as outcomes involving printers and the public. In-person interviews will be more effective at capturing the increased level of complexity and is estimated to be cost effective. State agency data, where it exists, will be collected to measure the length of time it takes to process permits under the old system verses processing time for PrintSTEP Notifications and Agreements.

### **Community Residents: Telephone Survey**

For the community it will be critical to evaluate their awareness of printers' activities, understanding of where to get information, and effectiveness of being a participant in the PrintSTEP process. Community residents participating in PrintSTEP will be interviewed after the public involvement process for the printer with whom they are involved is complete. PrintSTEP participants will be identified from the mailing lists for Actual Notice, and lists associated with the PrintSTEP Registry, Repository and public meetings. Interviews will collect information about the effectiveness of notice, access to information, ability to comment effectively, and the overall effectiveness of participation, and related improvements that result.

## **SECTION THREE: EVALUATION SCHEDULE**

The following list outlines the steps needed for implementation and evaluation of PrintSTEP, and prerequisites for data collection.

- 1 Research design finalized - DONE
- 2 Request for proposals goes out to states from EPA - DONE
- 3 States are selected for pilots - DONE
- 4 States begin implementation - DONE  
States designate staff to run pilots and review PrintSTEP applications - DONE  
States market program, invite printers to participate
- 5 Printers volunteer to participate
- 6 Data collection instruments developed  
*Critical implementation factors before finalizing data collection instruments:*
  - Is program open to all printers state-wide, or to printers in a specified locality?- DONE
  - How many printers volunteer?
  - Do printers apply for PrintSTEP all at once, or phased in over a specified time period, or phased in as their permits come up for renewal (if they already have permits)? - DONE
- 7 Baseline data collected from states and printers  
*Critical steps before baseline data collection occurs:*
  - State staff must be identified to implement PrintSTEP - DONE
  - All participating printers must be identified
- 8 Interim data collected from printers and community members  
*Critical steps before interim data collection occurs:*
  - Repository and registry must be established
  - Actual and/or general notice must have gone out for all of these applications
- 9 Interim Report submitted  
*Critical step before final data collection occurs:*
  - Pilot programs must be considered fully implemented
- 10 Final data collected from printers and states
- 11 Final Report submitted

## **SECTION FOUR: DATA COLLECTION AND ANALYSIS PLAN FOR EACH OF THE SEVEN OBJECTIVES**

### **1. PrintSTEP provides enhanced environmental protection.**

#### **a) Emissions, wastes and discharges from printing (both overall and for each medium) have decreased.**

Obtain quantitative data consistent with the program's environmental measures. Analyze results in each individual media, as well as overall changes to evaluate multi-media effects. Normalizing should be done to account for changes in production or product mix. If each facility is allowed to use their own index (i.e., their own denominator, such as sales or square feet of paper consumed), aggregate results would best be expressed as a *percent*.

##### **What data:**

- ▶ Specific pollutants or indicators (i.e., TSS) in wastewater. PrintSTEP will agree to 3-5 common printing discharges as indicators.
  - ▶ Pounds or gallons of total hazardous waste generated
  - ▶ Amount of materials previously being disposed that are now being recycled
  - ▶ Degree of opportunity of materials to be exposed to storm water
  - ▶ Total pounds of VOC emissions, total pounds of HAP emissions
- or
- ▶ Total gallons of VOC-containing product used, total gallons of HAP-containing product used
  - ▶ Unit of production/production index

##### **How:**

Participating printer submits Program Application, Storm Water Exposure Checklist, and Air Level Worksheets.

Comparison group printers will complete an application-equivalent.

##### **When:**

Before PrintSTEP, and at end of pilot

#### **b) PrintSTEP Improves Printers' Ability to Achieve Compliance.**

##### **What data:**

- ▶ Positive results from the following OTHER components of the evaluation indicate the improved ability for printers to achieve compliance:
  - Objective 3: PrintSTEP simplifies the regulatory process for printers.
  - Objective 6: There is sufficient motivation to participate in PrintSTEP.
  - Objective 7: PrintSTEP is cost effective for all stakeholders.

##### **How:**



Refer to the corresponding sections of the evaluation for how to collect data for the components listed above.

**When:**

Refer to the corresponding sections of the evaluation for when data will be collected for the components listed above.

**2. Participation in PrintSTEP results in increased use of pollution prevention.**

**a) Printers use of specific pollution prevention practices has increased**

**What data:**

- ▶ Do you use any of the following pollution prevention practices? (from a list of practices on application template - these have been reviewed by industry representatives)

**How:**

Telephone survey of participating printers and a comparison group.

**When:**

Before PrintSTEP, interim, and at end of pilot.

**b) Technical assistance provided through PrintSTEP is useful to printers and community members.**

Survey must be sensitive to those using technical assistance (TA) strictly because they need help implementing Print STEP. Creation of new TA centers, or number of people accessing TA strictly as a result of PrintSTEP is not necessarily a measure of effectiveness.

**What data:**

Ask printers and community members:

- ▶ Have you ever used technical assistance? Before or after PrintSTEP?
- ▶ Was technical assistance available to you when you needed it?
- ▶ Was it helpful?
- ▶ What type of technical assistance did you request?
- ▶ Was it easy to find out how to get in touch with a technical assistance provider?
- ▶ Were the PrintSTEP documents helpful to you in this regard?

**How:**

Telephone survey of printers and community participants

**When:**

At end of pilot.

**3. PrintSTEP simplifies the regulatory process for printers.**

**a) It is easier for printers to understand their regulatory requirements under PrintSTEP.**

**What data:**

- ▶ Has PrintSTEP improved your understanding of your regulatory requirements?

- ▶ Which aspects of PrintSTEP were difficult to understand?
- ▶ Did the PrintSTEP documents make things easier to understand?

**How:**

Telephone survey of PrintSTEP printers.

**When:**

Before PrintSTEP, interim, and at end of pilot.

**b) PrintSTEP increases printers' ability to respond to market conditions.**

To determine if changes are, in fact, a result of PrintSTEP, a comparison group will be used. The change being evaluated here may occur so infrequently that only anecdotal results may be available.

**What data:**

- ▶ Have you been delayed and/or prevented from responding to business opportunities (e.g., installing a new piece of equipment; meeting the request of a customer/potential customer for a different ink, coating, etc.; increasing production; bringing outsourced operations in-house) because of environmental requirements (e.g., a change to a permit or other approval from the local, state, or federal government)? In what way?

**How:**

Telephone survey of PrintSTEP printers and a comparison group.

**When:**

Before PrintSTEP, interim, and at end of pilot.

**c) PrintSTEP is effectively administered as a multi-media program.**

**What data:**

- ▶ Is there a single point of contact at the agency for all media/PrintSTEP questions?
- ▶ Has this person been accessible to you?
- ▶ Does the agency coordinate effectively across media and up through the organization?
- ▶ Did the coordination speed or slow the regulatory process?

**How:**

Telephone survey of PrintSTEP printers.

**When:**

Before PrintSTEP, interim, and at end of pilot

**4. PrintSTEP is more efficient for the states.**

**a) States can administer PrintSTEP as a multi-media program.**

Analysis will need to consider subjectivity of responses. It may be difficult to generalize from changes at the agency during the pilot to a fully implemented program.

**What data:**

- ▶ Does a recognizable cross-program infrastructure exist that functions for all media?
- ▶ Do you feel you are able to be more efficient at permitting printers?
- ▶ Are different program personnel able to coordinate effectively?

- ▶ Is there a clear understanding of roles and responsibilities at the agency?
- ▶ Is there a single point of contact at the agency for all media/PrintSTEP questions?
- ▶ Were the PrintSTEP *State Guide* and other documents helpful in administering the program?

**How:**

Interview state agency personnel.

**When:**

At end of pilot

**b) PrintSTEP reduces the total amount of time between initial application and final Agreement (compared to the multiple applications under the original system).**

*Note: this outcome only applies to currently permitted facilities.*

Analysis will be affected by how a particular pilot state currently tracks processing time.

**What data:**

- ▶ Time between initial application and final approval for each individual permit under the traditional system
- ▶ Time between initial application and final approval for a PrintSTEP Agreement

**How:**

- ▶ Measure time it took to receive all applicable permits under the original system for comparison group of printers
- ▶ Measure time it took to receive a PrintSTEP Agreement for participating printers

**When:**

Baseline, interim, and at end of pilot

**5. PrintSTEP involves the public.**

Collection of pre-implementation data is not viable because it will not be known who the participants will be before the start of the pilot.

**What data:**

From community members:

- ▶ How were you informed of PrintSTEP/your local printer?
- ▶ Has PrintSTEP increased your awareness of the printers in your neighborhood, and what they do with regard to the environment?
- ▶ Did PrintSTEP provide an opportunity for you to participate in the decision-making process?
- ▶ Were you able to obtain documents from the Repository?
- ▶ Were you able to read and understand them?
- ▶ Was there enough information for you to participate effectively?
- ▶ If public meetings were held, were they accessible to you (time of day, handicap accessible, etc.)?
- ▶ Were your concerns effectively addressed?
- ▶ Has a single point of contact at the regulatory agency been available to you?

- ▶ Were they able to assist you effectively?

From states:

- ▶ What outreach responsibilities did you handle?
- ▶ Did the public submit comments on PrintSTEP applications? request public meetings? attend meetings?
- ▶ Were community concerns effectively addressed?

From printers:

- ▶ What outreach responsibilities did you handle?
- ▶ Did printers benefit from the public involvement aspects of PrintSTEP?
- ▶ Did you involve the public early?
- ▶ Were you more aware of your neighbors and of potential environmental and health impacts now than before PrintSTEP?

From all:

- ▶ Is the Information Repository useful?
- ▶ Has there been an improvement in your ability to communicate more effectively with printers/regulators/community members?
- ▶ Did the PrintSTEP documents help you with public involvement?

**How:**

Telephone survey and/or focus groups of state, printer and community participants

**When:**

Interim, and at end of pilot.

## **6. There is sufficient motivation to participate in PrintSTEP.**

### **a) Participants would participate in a similar program again.**

**What data:**

- ▶ Would you participate in a similar program again?
- ▶ What recommendations do you have to improve the program?

**How:**

Telephone survey and/or focus groups of state, printer and community participants

**When:**

At end of pilot

### **b) Participants responses on the future benefits they see from the increased communication among states, communities, and printers.**

**What data:**

- ▶ What future benefits do you see from the increased communication?

**How:**

Telephone survey and/or focus groups of state, printer and community participants

**When:**

At end of pilot

## **7. PrintSTEP is cost effective for all stakeholders.**

### **a) Printers' costs**

Estimate costs from a cost model identifying the elements which might be influenced by the PrintSTEP process. It will be difficult to generalize from printers who participate in the pilot to costs of full-fledged implementation. *Note: Several costs items (operating, capital and inspection costs) were eliminated from the list because their relevance to the evaluation of PrintSTEP is insignificant.*

#### **What data: .**

- ▶ What filings were required prior to PrintSTEP? What fees were associated with them? Is there a fee for the PrintSTEP Notification or Agreement? (possible question for state agency).
- ▶ Labor costs associated with PrintSTEP application and with environmental regulations before PrintSTEP (printer recollection).
- ▶ Labor costs associated with PrintSTEP modifications and with modifications before PrintSTEP (printer recollection). (Account for process changes that would have triggered permit modifications but don't under PrintSTEP).
- ▶ Fees for outside engineers, consultants, or attorneys should be included above.
- ▶ Cost of outreach, including providing actual notice, if applicable.
- ▶ Cost savings from pollution prevention implementation.

#### **How:**

Telephone interview supplemented by written cost information (as a fax-back form following the telephone interview).

#### **When:**

Interim and at end of pilot.

### **b) State (and local) government costs**

Build a cost model for state administration of printer environmental regulations, identifying cost elements which might be influenced by the PrintSTEP process. *Note: Cost of inspections was deleted from this list because a change is not anticipated due to implementation of PrintSTEP.*

#### **What data:**

- ▶ administrative costs
- ▶ technical assistance
- ▶ public meetings
- ▶ repository
- ▶ notice
- ▶ other outreach, if applicable

#### **How:**

In-person interviews

**When:**

Baseline (to develop cost model), Interim and at end of pilot (to input to model).

**c) Community costs**

Build a cost model for community costs, identifying all the cost elements which might be influenced by the PrintSTEP process. It will be difficult to convert community time to monetary costs. *Note: Costs of repository and notice were deleted from this list because no cost is anticipated for the community.*

**What data:**

Collect information on labor costs (time spent) to community of participation in

- ▶ public meetings
- ▶ technical assistance
- ▶ reviewing information in repository
- ▶ other

Collect information on direct costs, if any

- ▶ monetary outlays (e.g. for child care)

**How:**

Telephone survey

**When:**

During community survey.

## **Appendix B:**

### Telephone Survey Instruments for Printers

<p><b>Printers</b> <b>WAVE 1</b></p>
--

INTRODUCTION:

GATEKEEPER INTRODUCTION:

May I please speak with (PRINTER).

IF NECESSARY: This is \_\_\_\_\_ calling from Abt Associates about (TREATMENT: an environmental program that (PRINTER) is participating in/CONTROL: a survey that (PRINTER) has volunteered to complete).

**PRINTSTEP PARTICIPANT INTRODUCTION**

Hello, this is \_\_\_\_\_ calling from Abt Associates about the PrintSTEP program. You may remember participating printers are being asked to complete a brief interview after they submit an application to the program. The data collected during these interviews will be kept confidential and not reported in any way that would allow you to be individually identified. The interview usually takes less than ten minutes.

Your participation in this interview is voluntary and will have no effect on your involvement in PrintSTEP or any other government program. This research is sponsored by the U. S. Environmental Protection Agency.

**CONTROL INTRODUCTION**

Hello, this is \_\_\_\_\_ calling from Abt Associates. We are interviewing printers in (STATE) about the impact of environmental regulations on the printing industry. You may recall that (TRADE ASSOCIATION) spoke with you about participating in this research. This research is sponsored by the U. S. Environmental Protection Agency.

The data collected during these interviews will be kept confidential and not reported in any way that would allow you to be individually identified. Participation in this interview is voluntary and will have no effect on your involvement in any government programs.

IF CONTROL PRINTER, SKIP TO QUESTION 2



1. What made you decide to participate in PrintSTEP? (MULTIPLE RESPONSE)

GOOD IMAGE IN COMMUNITY  
CUSTOMERS WANTED ME TO  
SUPPLIERS WANTED ME TO  
EMPLOYEES WANTED ME TO  
INTERESTED IN SAFER OPERATIONS  
OTHER PRINTERS IN AREA WERE JOINING  
LAWYER ADVISED ME TO  
OTHER (SPECIFY)

2. Do you have any required public involvement activities (not related to PrintSTEP)?

YES (ASK Q 2A)  
NO (SKIP TO QUESTION 3)  
REFUSED (SKIP TO QUESTION 3)  
DON'T KNOW (SKIP TO QUESTION 3)

2A. What type of public involvement requirements do you have?

PUBLIC SUBMITS COMMENTS  
PUBLIC MEETING HELD  
COMMUNITY INVOLVEMENT PLAN DEVELOPED  
FOLLOW-UP PUBLIC MEETING HELD  
PUBLIC APPEAL OF APPROVAL  
OTHER PUBLIC FORUM \_\_\_\_\_

3. The following questions are about the state environmental agency with which you interact for air, water, and hazardous waste regulatory issues.

Is there a single point-of-contact for all environmental regulatory questions, for some types of questions or do you always contact different people for different environmental regulations?

IF ASKED WHICH REGULATIONS: We mean in general, for the bulk of the regulations.

SINGLE POINT OF CONTACT FOR ALL  
SINGLE POINT OF CONTACT FOR SOME  
DIFFERENT PEOPLE FOR DIFFERENT MEDIA (SKIP TO Q. 4)

3A. How easy is it to get in touch with this person? Would you say it is...

Very easy  
Somewhat easy  
Somewhat difficult, or  
Very difficult

3B. How often is this person able to answer your multi-media or multi-program questions adequately?

Always  
Sometimes  
Rarely, or  
Never

3C. What effect does multi-media or multi-program coordination at the state agency have on the regulatory process? Does it usually...

Speed up the process,  
Slow down the process  
Sometimes speed it up and other times slow it down, or does it usually  
Have no effect at all

4. We would like to get a sense of printers' perception of current environmental regulatory requirements. For each area that I read, please tell me whether you would rate your own understanding as very good, fairly good, not very good or poor. How would you rate your understanding of the (READ ITEM)?

	Very Good	Fairly Good	Not Very Good	Poor
Air regulatory program and associated requirements	4	3	2	1
Storm Water regulatory program and associated requirements	4	3	2	1
Waste Water regulatory program and associated requirements	4	3	2	1

Hazardous Waste regulatory program and associated requirements	4	3	2	1
--	---	---	---	---

5. FOR EACH ITEM RESPONDENT ANSWERED NOT VERY GOOD OR POOR IN QUESTION 4 ABOVE, ASK:

What about the (air/storm water/waste water/ hazardous waste) regulatory program or requirements do you find difficult to understand?

TOO COMPLICATED

LACK OF EASY-TO-READ INFORMATION

NO TIME TO LEARN

HARD TO GET INFORMATION FROM GOVERNMENT STAFF

OTHER (SPECIFY)

6. Has an environmental requirement, for example, a change to a permit or other approval from the local, state, or federal government, ever affected your company's ability to respond to a business opportunity?

IF NECESSARY READ: For example, installing a new piece of equipment; meeting the request of a customer or potential customer for a different ink, coating, etc.; increasing production; or bringing out-sourced operations in-house?

YES

NO (SKIP TO CLOSING)

REFUSED (SKIP TO CLOSING)

DON'T KNOW (SKIP TO CLOSING)

- 6A. Can you describe a recent time this happened?

- 6B. How big an impact did this have on your company's profitability or growth opportunity? Would you say it was....

A severe negative impact

A serious negative impact

A moderate negative impact or

A slight negative impact

PRINTSTEP PARTICIPANT CLOSING: Those are all my questions today. Thank you very much for your time. You can expect to hear from us again in about a year to learn about your latest experiences with environmental regulations.

CONTROL CLOSING: I have several other questions that are in a written format. I will fax you the questions and there is a number where you can fax back the completed form. Please send this back as soon as possible. If you prefer, I can email you the written portion instead. What is your fax number/email address? Those are all my questions today. Thank you very much for your time.

## **Printers**

### **WAVE 2**

#### **INTRODUCTION:**

#### **GATEKEEPER INTRODUCTION:**

May I please speak with (PRINTER).

IF NECESSARY: This is \_\_\_\_\_ calling from Abt Associates about (TREATMENT: an environmental program that (PRINTER) is participating in/CONTROL: a survey that (PRINTER) has volunteered to complete).

#### **PRINTSTEP PARTICIPANT INTRODUCTION**

Hello, This is \_\_\_\_\_ calling from Abt Associates about the PrintSTEP program. You may remember participating printers are being asked to complete a brief interview after your PrintSTEP application is processed. approval of your PrintSTEP agreement or standard permit. [You may recall that we spoke with you a year ago about your participation with the PrintSTEP program]. We are doing this follow up interview to learn more about your latest experiences with environmental regulations. The data collected during these interviews will be kept confidential and not reported in any way that would allow you to be individually identified. The interview usually takes less than 20 minutes.

Your participation in this interview is voluntary and will have no effect on your involvement in PrintSTEP or any other government program. This research is sponsored by the U.S Environmental Protection Agency.

#### **CONTROL INTRODUCTION**

Hello, this is \_\_\_\_\_ calling from Abt Associates. You may recall we spoke with you a year ago about the impact of environment regulations on the printing industry as part of this [TRADE ASSOCIATION] supported project. We are doing this follow up interview to learn more about your latest experiences with environmental regulations. This research is sponsored by the U.S. Environmental Protection Agency.

The data collected during these interviews will be kept confidential and not reported in any way that would allow you to be individually identified. Your participation in this interview is voluntary and will have no effect on your involvement in any governmental program.

1. TREATMENT: Do you have any required public involvement activities not related to PrintSTEP?  
CONTROL: Do you have any required public involvement activities?

YES	1	ASK A
NO	2	SKIP TO 2
DON'T KNOW	3	SKIP TO 2

A. Which of the following are required?

Public submits comments	1
Public meeting held	2
Community involvement Plan developed	3
Follow-up public meeting held	4
Public appeal of approval	5
Other public forum (SPECIFY)	6

ASK PRINTERS IN [state name] ONLY:

2. Did you provide public notice (of your PrintSTEP application/related to any requirements statute in the last year)?

YES	1
NO	2 (SKIP TO 3)

A. What types of public notice of your (PrintSTEP/environmental permit) application did you use? Did you use.....CODE ALL THAT APPLY

	YES	NO
Direct mailing	1	2
Telephone contact	1	2
Newspaper notice or advertisement	1	2
Posted signs	1	2
Internet notice	1	2
In person or word-of-mouth	1	2
Any other type of notice (SPECIFY)	1	2

3. Did you have any community outreach activities such as an open house beyond those required by (PrintSTEP/an environmental statute)?

YES	1
NO	2 SKIP TO 4

- A. What type (types) of community outreach?  
(Was/were) there...

		YES	NO
An open house	1	2	
A public meeting		1	2
Hearings of conservation commission	1	2	
Hearings of health board		1	2
City council meetings		1	2
Written materials		1	2
Some other type of community outreach_____	1	2	

- B. How useful do you think these efforts to learn about community concerns and expectations were? Were they....

Very useful		4
Somewhat useful		3
Not very useful, or		2
Not useful at all	1	

(REFER TO QUESTION 1A AND QUESTION 3A. ASK QUESTION 4-6 ONLY OF PRINTERS WHO HELD PUBLIC MEETINGS). OTHERWISE SKIP TO QUESTION 7.

ASK PRINTERS IN [State name] ONLY:

4. Before you held your public meeting , did you provide public notice of the meeting?

YES	1
NO	2 SKIP TO 5

- A. In providing public notice, did you use..

	YES	NO
Direct mailing	1	2
Telephone contact	1	2
Newspaper notice or advertisement	1	2

Posted signs	1	2
Internet notice	1	2
In person or word-of-mouth	1	2
Any other type of notice (SPECIFY)		
-----	1	2

5. How useful was the [first/second] public meeting as a way to learn about community concerns and expectations? Would you say it was...

Very useful	4
Somewhat useful	3
Not very useful, or	2
Not useful at all	1

6. What would have made the [first/second] public meeting more useful? (MULTIPLE RESPONSES)

GREATER COMMUNITY ATTENDANCE  
 PARTICIPATION OF STATE AGENCY STAFF  
 COMMUNITY INVOLVEMENT PLAN DEVELOPED  
 OTHER (SPECIFY)\_\_\_\_\_

IF THERE WAS A SECOND MEETING, ASK QUESTIONS 4-6 FOR THE SECOND MEETING.

7. Did you receive written comments (on your PrintSTEP application/related to any environmental filing) during any part of the regulatory process?

YES	1
NO	2 SKIP TO 8

- A. How useful did you find the public comment process at addressing concerns? Would you say it was..

Very useful	4
Somewhat useful	3



Not very useful, or	2
Not useful at all	1

B. How useful did you find the public comment process at resolving issues?

Very useful	4
Somewhat useful	3
Not very useful, or	2
Not useful at all	1

8. Was a Community Involvement Plan developed?

YES	1
NO	2 SKIP TO 9

A. How useful did you find the Community Involvement plan at addressing concerns? Would you say it was ...

Very useful	4
Somewhat useful	3
Not very useful, or	2
Not useful at all	1

B. In what ways was it useful to you?

RESOLVED ISSUES  
 ADDRESSED CONCERNS  
 IDENTIFIED SUPPORT  
 OTHER (SPECIFY)\_\_\_\_\_

IF CONTROL PRINTER, SKIP TO QUESTION 10

9. Did you use the PrintSTEP Information Repository during any part of the regulatory process?

YES	1
NO	2 SKIP TO 10

- A. How satisfied were you with the information available used in the Information Repository? Were you...

Very satisfied	4 SKIP TO 10
Somewhat satisfied	3 SKIP TO 10
Somewhat unsatisfied, or	2
Very unsatisfied	1

- B. Why weren't you satisfied with the information available in the Information Repository ?

DIFFICULT TO ACCESS  
NOT ENOUGH USEFUL INFORMATION THERE  
DIDN'T KNOW ABOUT IT  
DIDN'T HAVE TIME /TOO BUSY  
OTHER (SPECIFY) \_\_\_\_\_

10. Did you obtain information from (*name of state contact person and office/office*) during any part of the regulatory process?

YES	1
NO	2 SKIP TO 11

- A. How satisfied were you with the information obtained from (*name of state contact person and office/office*) Were you....

Very satisfied	1 SKIP TO 11
Somewhat satisfied	2 SKIP TO 11
Somewhat unsatisfied, or	
Very unsatisfied	

- B. Why weren't you satisfied with this information?

DIDN'T KNOW WHO TO CALL  
COULDN'T REACH THEM  
DIDN'T NEED HELP  
DIDN'T HAVE TIME/TOO BUSY  
OTHER\_\_\_\_\_

11. Did you obtain information from (*technical assistance provider/center name*) during any part of regulatory process?

YES	1
NO	2 SKIP TO 12

- A. How satisfied were you with the assistance obtained from (*technical assistance provider/center name*)? Were you..

Very satisfied	4
Somewhat satisfied	3
Somewhat unsatisfied, or	2 SKIP TO 12
Very unsatisfied	1 SKIP TO 12

- B. Why weren't you satisfied with the assistance from (*Technical assistance provider/name*)? Would you say it was/there wasn't/ because you...

DIFFICULT TO ACCESS  
NOT ENOUGH USEFUL INFORMATION THERE  
DIDN'T KNOW ABOUT IT  
DIDN'T HAVE TIME/TOO BUSY  
OTHER (SPECIFY)

- 12 Did you obtain information from any other source?

YES	1
NO	2 SKIP TO 13

- A. What other source was this?

- B. How satisfied were you with the information obtained from (*name of other source*)? Would you say you were....

Very satisfied	4 SKIP TO 13
Somewhat satisfied	3 SKIP TO 13
Somewhat unsatisfied, or	2

Very unsatisfied

1

- C. Why weren't you satisfied with the information obtained from *(name of other source)*  
NOT ENOUGH USEFUL INFORMATION THERE  
DIDN'T KNOW WHO TO CALL  
DIDN'T HAVE TIME/TOO BUSY  
OTHER (SPECIFY)\_\_\_\_\_

IF CONTROL PRINTER, SKIP TO QUESTION 14.

13. Did you use the PrintSTEP Workbook or other PrintSTEP documents?

YES

1

NO

2 SKIP TO 14

- A. How satisfied were you with the content and format?  
Would you say you were....

Very satisfied

4 SKIP TO 14

Somewhat satisfied

3 SKIP TO 14

Somewhat unsatisfied, or

2

Very unsatisfied

1

- B. Why weren't you satisfied with the PrintSTEP documents?

DIDN'T KNOW THERE WERE ANY

DIDN'T HAVE THE INFORMATION I NEEDED

COULDN'T GET A COPY

DIDN'T HAVE TIME/TOO BUSY

WEREN'T WRITTEN IN YOUR PRIMARY LANGUAGE

OTHER (SPECIFY)\_\_\_\_\_

ASK PRINTSTEP RESPONDENTS AND CONTROL RESPONDENTS WHO INDICATED  
THEY HAD PUBLIC INVOLVEMENT IN QUESTIONS 1-3

14. Overall, how do you feel about the usefulness of the public involvement activities (of the  
PrintSTEP) program)? Were they...

Very useful	4 SKIP TO B
Somewhat useful	3 SKIP TO B
Not very useful, or	2
Not useful at all	1

16A. Why weren't your public involvement activities useful?

### **SKIP TO CLOSING**

16B. In what way were your public involvement activities useful?

**PRINTSTEP PARTICIPANT CLOSING:** Those are all my questions today. Thank you very much for your time. You can expect to hear from us once more gain in about a year to learn about your latest experiences with environmental regulations.

**CONTROL CLOSING:** I have several other questions that are in a written format. I will fax you the questions and there is a number where you can fax back the completed form. Please send this back as soon as possible. If you prefer, I can email you the written portion instead. What is your fax number/email address? Those are all my questions today. Thank you very much for your time.

**Printers**  
**WAVE 3**

**GATEKEEPER INTRODUCTION:**

May I please speak with (PRINTER).

IF NECESSARY: This is \_\_\_\_\_ calling from Abt Associates about (TREATMENT: an environmental program that (PRINTER) is participating in/CONTROL: a survey that (PRINTER) has volunteered to complete).

**PRINTSTEP PARTICIPANT INTRODUCTION**

Hello, This is \_\_\_\_\_ calling from Abt Associates about the PrintSTEP program. You may remember participating printers are being asked to complete a brief interview at the close of the pilot project. [ You may recall that we spoke with you a year ago about your participation with the PrintSTEP program]. We are doing this follow up interview to learn more about your latest experiences with environmental regulations. The data collected during these interviews will be kept confidential and not reported in any way that would allow you to be individually identified. The interview usually takes less than 20 minutes.

Your participation in this interview is voluntary and will have no effect on your involvement in PrintSTEP or any other government program. This research is sponsored by the U.S Environmental Protection Agency.

**CONTROL INTRODUCTION**

Hello, this is \_\_\_\_\_ calling from Abt Associates. You may recall we spoke with you two years ago about the impact of environment regulations on the printing industry as part of this [TRADE ASSOCIATION] supported project. We are doing this follow up interview to learn more about your latest experiences with environmental regulations. This research is sponsored by the U.S. Environmental Protection Agency.

The data collected during these interviews will be kept confidential and not reported in any way that would allow you to be individually identified. Your participation in this interview is voluntary and will have no effect on your involvement in any government program.

1. Have you been involved in any type of outreach or public involvement activity (since your PrintSTEP application was approved/in the last 2 years)?

YES  
NO

1  
2 SKIP TO 2

- A. What type of community outreach were you involved with? Were you involved with...

	YES	NO
An open house	1 2	
A public meeting	1	2
Hearings of conservation commission	1 2	
Hearings of health board	1	2
City council meetings	1	2
Written materials	1	2
Some other type of community outreach_____	1 2	

B. In general, how useful do you think these community outreach efforts were?

Very useful	4
Somewhat useful	3
Not very useful, or	2
Not useful at all	1

2. Was a Community Involvement Plan developed?

YES	1
NO	2 SKIP TO 3

A. In general, how useful did you find the Community Involvement Plan? Would you say it was ...

Very useful	4
Somewhat useful	3
Not very useful, or	2 SKIP TO C
Not useful at all	1 SKIP TO C

B. In what ways was it useful to you?

RESOLVED ISSUES  
 ADDRESSED CONCERNS  
 IDENTIFIED SUPPORT  
 OTHER (SPECIFY)\_\_\_\_\_

**SKIP TO 3**

C. Why was it not useful?

CONTROLS SKIP TO QUESTION 4

3. Since the time when your PrintSTEP application was approved, have you used the PrintSTEP Information Repository?

YES	1
NO	2 SKIP TO 4

A. How satisfied were you with the information available in the Information Repository?  
Were you...

Very satisfied	4 SKIP TO 4
Somewhat satisfied	3 SKIP TO 4
Somewhat unsatisfied, or	2
Very unsatisfied	1

B. Why weren't you satisfied with the information available in the Information Repository ?

DIFFICULT TO ACCESS  
NOT ENOUGH USEFUL INFORMATION THERE  
DIDN'T KNOW ABOUT IT  
DIDN'T HAVE TIME /TOO BUSY  
OTHER (SPECIFY) \_\_\_\_\_

4. (Since the time when your PrintSTEP application was approved/In the last 2 years), have you obtained information from (*name of state contact person and office/office*)?

YES	1
NO	2 SKIP TO 5

A. How satisfied were you with the information obtained from (*name of state contact person and office/office*) Were you....

Very satisfied	1 SKIP TO 5
Somewhat satisfied	2 SKIP TO 5
Somewhat unsatisfied, or	
Very unsatisfied	



B. Why weren't you satisfied with this information?

DIDN'T KNOW WHO TO CALL  
COULDN'T REACH THEM  
DIDN'T NEED HELP  
DIDN'T HAVE TIME/TOO BUSY  
OTHER\_\_\_\_\_

5. (Since the time when your PrintSTEP application was approved/In the last 2 years), have you obtained information from (*technical assistance provider/center name*)?

YES	1
NO	2 SKIP TO 6

A. How satisfied were you with the assistance obtained from (*technical assistance provider/center name*)? Were you..

Very satisfied	4 SKIP TO 6
Somewhat satisfied	3 SKIP TO 6
Somewhat unsatisfied, or	2
Very unsatisfied	1

B. Why weren't you satisfied with the assistance from (*Technical assistance provider/name*)?

DIFFICULT TO ACCESS  
NOT ENOUGH USEFUL INFORMATION THERE  
DIDN'T KNOW ABOUT IT  
DIDN'T HAVE TIME/TOO BUSY  
OTHER (SPECIFY)

6. (Since the time when your PrintSTEP application was approved/In the last 2 years), have you obtained environmental regulatory information from any other source?

YES	1
NO	2 SKIP TO 7

A. What other source was this?

- B. How satisfied were you with the information obtained from (*name of other source*)?  
Would you say you were....

Very satisfied	4 SKIP TO 7
Somewhat satisfied	3 SKIP TO 7
Somewhat unsatisfied, or	2
Very unsatisfied	1

- C. Why weren't you satisfied with the information obtained from (*name of other source*)

NOT ENOUGH USEFUL INFORMATION THERE  
DIDN'T KNOW WHO TO CALL  
DIDN'T HAVE TIME/TOO BUSY  
OTHER (SPECIFY)\_\_\_\_\_

IF CONTROL PRINTER, SKIP TO QUESTION 9

7. Since the time when your PrintSTEP application was approved, have you used the PrintSTEP Workbook or other PrintSTEP documents?

YES	1
NO	2 SKIP TO 8

- A. How satisfied were you with the content and format?  
Would you say you were....

Very satisfied	4 SKIP TO 8
Somewhat satisfied	3 SKIP TO 8
Somewhat unsatisfied, or	2
Very unsatisfied	1

- B. Why weren't you satisfied with the PrintSTEP documents?

DIDN'T KNOW THERE WERE ANY  
DIDN'T HAVE THE INFORMATION I NEEDED  
COULDN'T GET A COPY  
DIDN'T HAVE TIME/TOO BUSY

WEREN'T WRITTEN IN YOUR PRIMARY LANGUAGE  
OTHER (SPECIFY)\_\_\_\_\_

8. I'm going to read of list of possible outcomes of the PrintSTEP public involvement activities. For each one, please tell me if it was an outcome of your own involvement. Was (ITEM) an outcome?

	YES	NO
New information was introduced about the environmental impacts of your facility	1	2
Different approaches were developed to address environmental problems	1	2
The schedule for printers' PrintSTEP Agreements was lengthened or shortened compared to the time it used to take under the standard permitting process	1	2
Different requirements or environmental limits were set in the Agreements	1	2
The final Agreement was different from what it would have been without public involvement	1	2
ASK IF NO "YES" RESPONSE ABOVE: No outcomes were affected	1	2

9. The following questions are about the state environmental agency with which you interact for air, water, and hazardous waste regulatory issues.

Is there a single point-of-contact for all environmental regulatory questions, for some types of questions or do you always contact different people for different environmental regulations?

IF ASKED WHICH REGULATIONS: We mean in general, for the bulk of the regulations.

SINGLE POINT OF CONTACT FOR ALL  
SINGLE POINT OF CONTACT FOR SOME  
DIFFERENT PEOPLE FOR DIFFERENT MEDIA (SKIP TO Q. 11)

A. How easy is it to get in touch with this person? Would you say it is...

Very easy	4
Somewhat easy	3
Somewhat difficult, or	2
Very difficult	1

B. How often is this person able to answer your multi-media or multi-program questions adequately?

Always	4
Sometimes	3
Rarely, or	2
Never	1

C. What effect does multi-media or multi-program coordination at the state agency have on the regulatory process? Does it usually...

Speed up the process	1
Slow down the process	2
Sometimes speed it up and other times slow it down, or	3
Have no effect at all	4

10. We would like to get a sense of printers' perception of current environmental regulatory requirements. For each area that I read, please tell me whether you would rate your own understanding as very good, good, fair or poor. How would you rate your understanding of the (READ ITEM)?

	VERY GOOD	GOOD	FAIR	POOR
Air regulatory program and associated requirements	4	3	2	1
Storm Water regulatory program and associated requirements	4	3	2	1
Waste Water regulatory program and associated requirements	4	3	2	1
Hazardous Waste regulatory program and associated requirements	4	3	2	1

11. FOR EACH ITEM RESPONDENT ANSWERED NOT VERY GOOD OR POOR IN QUESTION 10 ABOVE, ASK:

What about the (air/storm water/waste water/ hazardous waste) regulatory program or requirements do you find difficult to understand?

TOO COMPLICATED

LACK OF EASY-TO-READ INFORMATION

NO TIME TO LEARN

HARD TO GET INFORMATION FROM GOVERNMENT STAFF

OTHER (SPECIFY)

12. Has an environmental requirement, for example, a change to a permit or other approval from the local, state, or federal government, ever affected your company's ability to respond to a business opportunity?

IF NECESSARY READ: For example, installing a new piece of equipment; meeting the request of a customer or potential customer for a different ink, coating, etc.; increasing production; or bringing out-sourced operations in-house?

YES

1

NO

2 SKIP TO 13

A. Can you describe a recent time this happened?

B. How big an impact did this have on your company's profitability or growth opportunity? Would you say it was...

A severe negative impact

1

A serious negative impact

2

A moderate negative impact or

3

A slight negative impact

4

13. (Since PrintSTEP/In the past 3 years), has the time you've spent on record keeping related to environmental requirements increased, decreased, or remained the same, ignoring changes

related to variations in your production volume?

INCREASED	1
DECREASED	2
REMAINED THE SAME	3

14. (Since PrintSTEP/In the past 3 years), has the time you've spent on reporting related to environmental requirements increased, decreased, or remained the same, ignoring changes related to variations in your production volume?

INCREASED	1
DECREASED	2
REMAINED THE SAME	3

15. **CONTROL PRINTERS SKIP TO CLOSING**

Do you see any benefits from your involvement in PrintSTEP?

YES	1
NO	2 SKIP TO 16

A. What benefits do you see from your involvement in the process?

16. Were there any drawbacks to being involved?

YES	1
NO	2 SKIP TO 17

A. What were the drawbacks?

17. What recommendations do you have for program improvements?

18. Overall, how satisfied are you with the PrintSTEP process?

Very satisfied	4
Somewhat satisfied	3
Somewhat unsatisfied, or	2

Very unsatisfied.

1

**CLOSING:** Those are all my questions for today. Thank you very much for your time.



# **Appendix C:**

## **PrintSTEP Application Template**

# PrintSTEP Application

## 1. Background Information

Reporting year:		
This is a ( <b>circle one</b> ):	Initial PrintSTEP Application	or Annual PrintSTEP Renewal
Your Name:	Phone:	
Facility Name:	Fax:	
Street Address:	E-mail:	
City:	Zip:	
Number of Employees ( <i>Specify full-time or part-time</i> ) :		

## 2. Accounting for changes in production

***Please complete only ONE of the next 4 rows:***

For facilities that track production by square feet of substrate printed annually, enter that value for the reporting year: _____
For facilities that track production by annual sales, enter your Total Sales for the reporting year: \$_____
For facilities that track production by annual labor hours, enter your Total Labor Hours for printing operations for the reporting year: _____ hours
For facilities that do not track by these measures, enter the type, units, and value of an alternative normalizing measure for the reporting year: _____

### 3. Type of Printing Operations

<b>TYPE OF PRINTING PROCESSES YOU USE</b>	<b>Check all that apply</b>	<b>If you have multiple processes, indicate the percentage of production from each process*:</b>
Sheetfed Lithography		
Nonheatset Web Lithography		
Heatset Web Lithography		
Flexography		
Screenprinting		
Gravure		

### 4. Waste water Information

<i>(check yes or no)</i>		Yes	No
Do you discharge any wastewater to a septic system?			
Do you discharge industrial waste water to the sewer district?			
Are you designated as a Significant Industrial User (SIU)?			
Do you discharge wastewater directly to surface water?			
If you answered "yes" to any of the above questions, does the discharge require a permit of any kind?			
If you have a wastewater permit, complete the following information:			
Date Permit Obtained:		Permitting Authority:	
Expiration Date:		Permit Number:	
Estimate the amount of waste water discharged over the last 12 mos.		gal/year	

## 5. Hazardous Waste Generation

What is your RCRA generator status?		Check one:	Enter your EPA hazardous waste generator number:
	No hazardous waste generated		- not applicable -
	Conditionally Exempt Generator		
	Small Quantity Generator		
	Large Quantity Generator		
If you have a hazardous waste permit (required in some localities), complete the following:			
	Date Permit Obtained:		Permitting Authority:
	Expiration Date:		Permit Number:

**List all hazardous wastes generated during the reporting year:**

Name of the Waste	Waste Type*	Process or Activity Generating Waste	Amount Generated (lbs or gal)

\* If the waste is a listed hazardous waste, enter the RCRA waste code, otherwise enter the RCRA characteristic – ignitable, corrosive, reactive, or toxic.

## 6. Air Emissions

What is your Air Level? (from Chapter 1 of the <i>Workbook</i> )					
	<b>circle one:</b>	1	2	3	4
What method did you use to determine your Air Level (from Chapter 1 of the <i>Workbook</i> )?					
	<b>circle one:</b>	Materials Use Worksheet	or	Emissions Calculations Worksheet	
→ Attach a copy of your completed Worksheet to this Application.					
If you have a permit for air emissions, complete the following:					

	<b>circle one:</b>	Preconstruction permit	or	Operating permit
	Date Permit Obtained:		Permitting Authority:	
	Expiration Date:		Permit Number:	

## 7. Storm water

**Attach a copy of your Storm water Checklist from the Plain Language Workbook, or complete the following table.**

***Are any of the following items exposed to precipitation, now or in the foreseeable future?***

	Yes	No
a. vehicles used in material handling (excepting adequately maintained mobile equipment).		
b. industrial machinery or equipment		
c. residue from the cleaning of machinery or equipment		
d. materials associated with vehicular maintenance, cleaning, or refueling		
e. materials or products during loading/unloading or transporting activities		
f. materials or products at uncovered loading docks		
g. materials or products stored outdoors (except for products intended for outdoor use, e.g., cars)		
h. materials or products handled/stored on roads or railways owned or maintained by the certifier		
i. materials or spill/leak residues accumulated in storm water inlets		
j. residuals on the ground from spills/leaks (including subsurface residuals from percolation)		
k. materials contained in open or deteriorated storage tanks/drums/containers		
l. industrial activities conducted outdoors		
m. materials or products from past outdoor industrial activity		
n. waste material		
o. process waste water disposed of outdoors (unless otherwise permitted)		
p. particulate matter from roof stack/vents not otherwise regulated (i.e., under air quality control permit) and in quantities detectable in the storm water outflow		
q. visible deposits of residuals near roof or side vents		
r. spills/leaks resulting from maintenance of stacks or air exhaust systems		

If you have a NPDES permit for storm water, complete the following:			
	<b>circle one:</b> General NPDES permit		or Individual NPDES permit
	Date Permit Obtained:		Permitting Authority:
	Expiration Date:		Permit Number:

## 8. Public Involvement

How has your facility interacted with your community and immediate neighbors in the past year regarding environmental concerns?	Check all that apply
Open House	
Mailings - advertising	
Mailings - non-advertising	
Discussions with Community leaders	
Public Meeting	
No Activity	
Other (please describe):	

## 9. Pollution Prevention

<b>Pollution Prevention Practice</b> For new PrintSTEP applicants, answer: Have you ever...? For annual renewal of PrintSTEP, answer: Over the last year, have you?	Check Yes, No, or Don't Know for each row:		
	Yes	No	Don't Know
Eliminated chrome based cleaners?			
Installed silver recovery units?			
Properly maintained silver recovery units?			
Properly maintained film and plate processing units (e.g., flow rates, squeegees, secondary containment, holding tanks and pipes/tubing)?			
Utilized Code of Silver Practices steps to recover silver from film fixers?			
Investigated use of developer and fixer recycling units for film processors?			
Investigated use of low replenishing rate film chemistry?			

<b>Pollution Prevention Practice</b> For new PrintSTEP applicants, answer: Have you ever...? For annual renewal of PrintSTEP, answer: Over the last year, have you?	Check Yes, No, or Don't Know for each row:		
	Yes	No	Don't Know
Investigated use of washwater recycling units for film and plate processors?			
Investigated use of digital, dry, or water-based proofing systems?			
Instituted an ink inventory system to reduce waste ink disposal costs?			
Instituted a switch to low VOC ink systems, such as UV curable, water-based technology or vegetable based ink systems?			
Investigated the use of stay open and cartridge ink delivery system for sheetfed offset lithographic inks?			
Used chiller re-circulators to lower temperature of fountain solutions to reduce evaporation and lower air emissions?			
Instituted a switch to isopropyl alcohol free fountain solutions or reduced concentration of isopropyl alcohol in fountain solution?			
Investigated the installation of filtration system for fountain solution recirculation system?			
Switched to low vapor pressure or low VOC cleaning solvents (less than 10 mm Hg at 20 degrees Celsius) to reduce air emissions and quantity of solvent purchased?			
Eliminated the use of f-listed solvents and substituted d-listed or nonhazardous solvents to reduce the toxicity of hazardous waste generated?			
Instituted a solvent recycling/reuse system?			
Implemented a shop towel management? policy so that soiled wipers are stored in closed or covered safety containers to reduce air emissions?			
Instituted a program to recover free liquids from shop towels either on-site or off-site,( i.e., gravity draining via false bottom collection drums, hand wringers, centrifuges, etc.)?			
Implemented a solid waste/recycling program by recycling all possible items from your solid waste stream?			
Reused and recycled pallets and skids to reduce solid waste?			
Collected and recycled used oil, other lubricants, and batteries?			
Recycled parts washing fluids?			
Implemented a program to manage and recycle spent fluorescent and high intensity discharge lamps?			

<b>Pollution Prevention Practice</b> For new PrintSTEP applicants, answer: Have you ever...? For annual renewal of PrintSTEP, answer: Over the last year, have you?	Check Yes, No, or Don't Know for each row:		
	Yes	No	Don't Know
Where possible, used low solvent, no solvent-based, or water-based adhesives and glues?			
Where possible, used low solvent, or water-based ink jet inks?			
Requested vendor take back all samples not consumed?			
Used first in first out inventory control system?			
Covered all open containers of liquids and keep them closed?			
Stored all materials to minimize damage due to mishandling or accidents?			

## 10. Technical Assistance

As a PrintSTEP participant, you will have access to free technical assistance. These specialists can help you with pollution prevention, environmental compliance, or any questions on PrintSTEP. Check here if you would like a technical assistance specialist to contact you: ☐



## **Appendix D:**

### Telephone Survey Instrument for Community Members

<p>QUESTIONS FOR TELEPHONE SURVEY:</p> <p><b>Community Members</b></p>
--

ASK TO SPEAK WITH DESIGNATED RESPONDENT. WHEN CONNECTED SAY:

Hello, this is \_\_\_\_\_ calling from Abt Associates about your participation in the PrintSTEP program. You may remember that participating members of your community are being asked to complete a brief interview about their PrintSTEP participation. The data collected during these interviews will be kept confidential and not reported in any way that would allow you to be individually identified. The interview usually takes about fifteen minutes.

Your participation in this interview is voluntary. This research is sponsored by the U. S. Environmental Protection Agency.

1. First, can you tell me the name of the printer or printers you were involved with?

PRINTER #1 \_\_\_\_\_  
 PRINTER #2 \_\_\_\_\_

2. Are you...	YES	NO
An employee of printer	1	2
A member of a community or local activist group?	1	2
A professional educator	1	2
An environmental professional	1	2

3. Is your home or place of work within a half mile of (PRINTER #1 (or PRINTER #2))?

YES	1
NO	2

4. How did you first hear about PrintSTEP? DO NOT READ LIST. CODE ONE ANSWER.

MAILING	1	
TELEPHONE CONTACT	2	
NEWSPAPER NOTICE OR ADVERTISEMENT	3	
POSTED SIGNS	4	
INTERNET		5
IN PERSON, WORD-OF-MOUTH	6	
OTHER TYPE OF NOTICE _____	7	

5. What made you decide to participate in PrintSTEP?
6. IF A [COMMUNITY OUTREACH ACTIVITY OTHER THAN WHAT IS REQUIRED] WAS HELD, ASK:
- A. Did you hear about the [EVENT] on [DATE] before it happened?
- |     |   |
|-----|---|
| YES | 1 |
| NO  | 2 |
- B. Did you attend the [EVENT]?
- |     |               |
|-----|---------------|
| YES | 1             |
| NO  | 2 SKIP TO Q.7 |
- C. Did you take vacation time or unpaid time off work to attend the [EVENT]?
- |     |             |
|-----|-------------|
| YES | 1           |
| NO  | 2 SKIP TO E |
- D. How many hours of unpaid time or vacation time did you take to attend (EVENT)?
- \_\_\_\_\_ HOURS
- E. How much did you spend in out of pocket expenses like bus or cab fare, parking, paying a babysitter or any other costs you incurred to attend the [EVENT]?
- \$ \_\_\_\_\_
- F. How useful was the [EVENT] as a way to learn about [PRINTER #1] and their application for environmental approval?
- |                    |   |
|--------------------|---|
| Very useful        | 1 |
| Somewhat useful    | 2 |
| Not very useful or | 3 |
| Not useful at all  | 4 |
7. Did you review the printers' application?
- |     |              |
|-----|--------------|
| YES | 1 SKIP TO 8A |
| NO  | 2            |

Why not?

TOO MUCH TROUBLE/TOO LONG/TOO

COMPLICATED

1

DIDN'T KNOW I COULD/NO

OPPORTUNITY

2

NOT INTERESTED

3

NEVER GOT AROUND TO IT

4

OTHER (SPECIFY)

6

8. Did you submit written comments?

YES

1

NO

2 SKIP TO 9

A. How satisfied were you with the public comment process? Would you say you were...

Very satisfied

4

Somewhat satisfied

3

Somewhat unsatisfied, or

2

Very unsatisfied

1

9. IF A 'POST APPLICATION' PUBLIC MEETING WAS HELD, ASK THE QUESTION BELOW. IF NOT, SKIP TO 14.

Did you hear about the [first] public meeting on [date] before it happened

YES

1

NO

2 SKIP TO 10

A. How did you find out about the meeting? CODE ALL THAT APPLY

MAILING

1

TELEPHONE CONTACT

2

NEWSPAPER NOTICE OR ADVERTISEMENT

3

POSTED SIGNS

4

INTERNET

5

IN PERSON, WORD-OF-MOUTH

6

OTHER TYPE OF NOTICE \_\_\_\_\_

7

10. Did you attend the [first] public meeting?

YES

1

NO

2 SKIP TO 11

A. Did you take vacation time or unpaid time off work to attend the [EVENT]?

YES	1
NO	2 SKIP TO E

B. How many hours of unpaid time or vacation time did you take to attend (EVENT)?

\_\_\_\_\_HOURS

C. How much did you spend in out of pocket expenses like bus or cab fare, parking, paying a babysitter or any other costs you incurred to attend the [EVENT]?

\$ \_\_\_\_\_

11. How satisfied were you with the information provided at the [first] public meeting? Would you say you were....

Very satisfied	4
Somewhat satisfied	3
Somewhat unsatisfied, or	2
Very unsatisfied.	1

12. How useful was the [first] public meeting as a way to learn about [PRINTER #1] and their application for environmental approval?

Very useful	1
Somewhat useful	2
Not very useful or	3
Not useful at all	4

13. What would have made the [first] public meeting more useful?

**IF THERE WAS A SECOND PUBLIC MEETING, REPEAT THE QUESTIONS ABOVE.**

14. Was a Community Involvement Plan developed?

YES	1
NO	2 SKIP TO 15

A. Did you find it....

Very useful	4
-------------	---

Somewhat useful	3
Not very useful or	2
Not useful at all	1

15. Have you ever participated in any environmental regulatory action before --for example, attended a public meeting or provided comments?

YES	1
NO	2

16. Did you use the PrintSTEP Information Repository?

YES	1
NO	2 SKIP TO B

- A. How satisfied were you with the information available?

Very satisfied	4 SKIP TO 17
Somewhat satisfied	3 SKIP TO 17
Somewhat unsatisfied	2 SKIP TO 17
Very unsatisfied.	1 SKIP TO 17

- B. Why not?

DIFFICULT TO ACCESS  
 NOT ENOUGH INFORMATION THERE  
 DIDN'T KNOW ABOUT IT  
 DIDN'T HAVE TIME/TOO BUSY  
 OTHER (SPECIFY)

17. Did you obtain information from [*state contact person/office*]?

YES	1
NO	2 SKIP TO B

- A. How satisfied were you with the information you obtained?

Very satisfied	4 SKIP TO 18
Somewhat satisfied	3 SKIP TO 18
Somewhat unsatisfied	2 SKIP TO 18

Very unsatisfied.

1 SKIP TO 18

B. Why not?

DIDN'T KNOW WHO TO CALL  
COULDN'T REACH THEM  
DIDN'T NEED HELP  
DIDN'T HAVE TIME/TOO BUSY  
OTHER (SPECIFY)

18. Did you get any assistance from [technical assistance provider/center name]?

YES

1

NO

2 SKIP TO B

A. How satisfied were you with the information you obtained?

Very satisfied

4 SKIP TO 19

Somewhat satisfied

3 SKIP TO 19

Somewhat unsatisfied

2 SKIP TO 19

Very unsatisfied.

1 SKIP TO 19

B. Why not?

DIFFICULT TO ACCESS  
NOT ENOUGH USEFUL INFORMATION THERE  
DIDN'T KNOW ABOUT IT  
DIDN'T HAVE TIME/TOO BUSY  
OTHER (SPECIFY)

19. Did you seek assistance from another source?

YES

1

NO

2 SKIP TO C

A. From what other source did you seek assistance?

B How satisfied were you with the information you obtained?

Very satisfied

4 SKIP TO 20

Somewhat satisfied

3 SKIP TO 20

Somewhat unsatisfied, o  
Very unsatisfied.

2 SKIP TO 20  
1 SKIP TO 20

C. Why not?

DIDN'T NEED TO  
NEEDED TO, BUT DIDN'T KNOW WHO TO CALL  
DIDN'T HAVE TIME/TOO BUSY  
OTHER (SPECIFY)

20. Did you use the PrintSTEP Community Handbook or other documents?

YES  
NO

1  
2 SKIP TO B

A. How satisfied were you with the content and format?

Very satisfied  
Somewhat satisfied  
Somewhat unsatisfied, o  
Very unsatisfied.

4 SKIP TO 21  
3 SKIP TO 21  
2 SKIP TO 21  
1 SKIP TO 21

B. Why not?

DIDN'T KNOW THERE WERE ANY  
COULDN'T GET A COPY  
WEREN'T WRITTEN IN MY PRIMARY LANGUAGE  
DIDN'T HAVE TIME/TOO BUSY  
OTHER (SPECIFY)

21. We talked about costs and the time associated with attending meetings and events. Now we'd like to identify the other costs you have incurred related to your participation in the PrintSTEP program overall. I'll read a list of activities on which you may have spent time or money. For each one, I'll ask you to estimate the time you have devoted to it, the time, if any for which you lost wages and then an estimate of any major out-of-pocket expenses you incurred.

Did you (READ ACTIVITY)?

IF YES:

- A. Altogether, how many hours did you spend (ACTIVITY)?
- B. For how many of these hours did you lose wages?
- C. How much did you spend out of pocket on (ACTIVITY)?



ACTIVITY	PARTICIPATE		A. HOURS SPENT	B. HRS OF LOST WAGES	C. EXPENSES
	YES	NO			
Review(ing) printers' applications					
Obtain(ing) and review(ing) other materials					
Prepar(ing) and submit(ing) comments					
Resolv(ing) outstanding issues such as CIP development)					
Other (specify)					

22. Overall, how satisfied were you with your opportunities to be involved with the approval of [PRINTER #1]?

Very satisfied	4
Somewhat satisfied	3
Somewhat unsatisfied	2
Very unsatisfied	1

23. For which aspects of the process was the public involvement component most successful?  
SELECT ALL THAT APPLY

REVIEWING PRINTERS' APPLICATIONS  
OBTAINING AND REVIEWING OTHER MATERIALS  
PREPARING AND SUBMITTING COMMENTS  
RESOLVING OUTSTANDING ISSUES  
OTHER (SPECIFY)

24. For which aspects of the process was the public involvement least successful?

REVIEWING PRINTERS' APPLICATIONS  
OBTAINING AND REVIEWING OTHER MATERIALS  
PREPARING AND SUBMITTING COMMENTS  
RESOLVING OUTSTANDING ISSUES  
OTHER (SPECIFY)

25. How much of a difference do you feel that the involvement of community members like you made a difference in the outcome?

A big difference	4 ASK A
A moderate difference	3 ASK A
A little difference, or	2 ASK B

No difference at all

1 ASK B

A. In what way?

B. Why do you think you were not able to make a difference?

26. Do you feel that your participating in PrintSTEP has ...

YES NO

Taught you new information

1 2

Had an impact on the outcome of the process

1 2

Developed new relationships

1 2

Improved communication or trust with printers or regulators

1 2

27. What else has PrintSTEP helped you accomplish?

DID NOT ACCOMPLISH ANYTHING

0

IF NO TO ALL ITEMS IN QUESTION 26 AND DID NOT ACCOMPLISH ANYTHING  
ANSWERED FOR QUESTION 27, ASK:

28. Do you think anything was accomplished by your participation in PrintSTEP?

YES

1 ASK A

NO

2

A. What?

29. Were there any drawbacks to being involved?

YES

1 ASK A

NO

2

A. What were the drawbacks?

EXPENSES/COST/MONEY SPENT

TIME/TOO MUCH TIME

DIDN'T LIKE SOME OF OTHER PEOPLE

OTHER (SPECIFY)

30. What recommendations do you have for program improvements?

31. Overall, how satisfied are you with the PrintSTEP process?

Very satisfied	4
Somewhat satisfied	3
Somewhat unsatisfied, or	2
Very unsatisfied.	1

CLOSING: That's all my questions. I thank you very much for your time.

## **Appendix E:**

### Federal Register Notice

[Federal Register: March 14, 2000 (Volume 65, Number 50)]

[Notices]

[Page 13748-13749]

From the Federal Register Online via GPO Access [wais.access.gpo.gov]

[DOCID:fr14mr00-65]

=====

==

-----

## ENVIRONMENTAL PROTECTION AGENCY

[FRL-6548-3]

Agency Information Collection Activities: Proposed Collection;  
Comment Request; Evaluation of **PrintSTEP**

AGENCY: Environmental Protection Agency (EPA).

ACTION: Notice.

-----

SUMMARY: In compliance with the Paperwork Reduction Act (44 U.S.C. 3501 et seq.), this document announces that EPA is planning to submit the following proposed Information Collection Request (ICR) to the Office of Management and Budget (OMB): Evaluation of **PrintSTEP**, EPA ICR Number: 1941.01.

Before submitting the ICR to OMB for review and approval, EPA is soliciting comments on specific aspects of the proposed information collection as described below.

DATES: Comments must be submitted on or before May 15, 2000.

ADDRESSES: Interested persons may obtain a copy of the draft ICR by request from the Office of Compliance, by contacting Amy Porter at the contact information provided below. Details of the **PrintSTEP** evaluation is available on the Internet at [http://www.epa.gov/ooaujeag/sectors/pdf/pgm\\_\\_eval.pdf](http://www.epa.gov/ooaujeag/sectors/pdf/pgm__eval.pdf)

FOR FURTHER INFORMATION CONTACT: Amy Porter, 2221A, 1200 Pennsylvania Avenue NW, Washington DC, 20460. Phone: (202) 564-2431, Fax: (202) 564-0027, E-mail: [porter.amy@epa.gov](mailto:porter.amy@epa.gov)

**SUPPLEMENTARY INFORMATION:** Affected entities: Entities potentially affected by this action are those which volunteer to participate in the **PrintSTEP** pilots including State officials in Missouri, New Hampshire, and Minnesota and printers in those 3 states who participate in the pilots or the evaluation control groups, and members of the communities where participating printers are located.

Title: Proposed Information Collection Request for the Evaluation of **PrintSTEP**.

Abstract: Information will be collected for evaluation of the **PrintSTEP** pilot program. The evaluation aims to systematically identify the impacts the program has had on three types of stakeholders: printers, community residents, and the state government agencies administering the program. Specifically, the evaluation will determine the extent to which the 7 goals of the pilot program are met. The goals are: enhanced environmental protection; increased use of pollution prevention practices; simplified regulatory process for printers; improved efficiency of administration for state governments; enhanced public involvement; participants' realize benefits and are motivated to participate in **PrintSTEP**; and, cost effectiveness for all stakeholders. This broad set of expected outcomes will require a range of distinct data collection and analysis activities. Data will be gathered from printer's program applications, from telephone interviews, from in-person interviews and possibly from focus groups. Data will be collected before implementation, a short time after program implementation, and at the end of the pilot. Responses to the collection of information are voluntary. Names of persons providing information will be not recorded. More information is available in the final draft of the Evaluation Strategy which can be accessed at [http://www.epa.gov/ooaujeag/sectors/pdf/pgm\\_\\_eval.pdf](http://www.epa.gov/ooaujeag/sectors/pdf/pgm__eval.pdf) An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR Chapter 15.

The EPA would like to solicit comments to:

(i) evaluate whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility; (ii) evaluate the accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used;

(iii) enhance the quality, utility, and clarity of the information to be collected; and

(iv) minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses.

## Burden Statement

### Estimated Recordkeeping and Reporting Hour Burden on Respondents

The **PrintSTEP** evaluation includes a telephone interview with three types of respondents: (1) Printers who are voluntarily participating in the **PrintSTEP** program; (2) a comparison group of printers who are not participating in **PrintSTEP**; and (3) community members who have participated in the public involvement component of **PrintSTEP**. For both types of printers, written data will be collected on their costs associated with **PrintSTEP** and/or regulatory activities. For the comparison group of printers, additional written data will be collected on environmental releases. The written

information requested is expected to take one hour for the printers participating in **PrintSTEP** and 2.75 hours for the comparison group printers. Comparison group printers will be asked to submit information on their environmental releases which the pilot participants provide in their **PrintSTEP** applications. It is anticipated that a total of 320 printers will be interviewed three times during the course of the evaluation and that they will be either an environmental professional, or a manager. It is expected that one interview will be conducted with each of 50 community members.

The telephone portion of the survey for printers is expected to take 15 minutes to complete. The telephone interview with community members is expected to take 15 minutes. The estimates of respondent burden are shown in the table below.

[[Page 13749]]

Respondent ty (\$)	Estimated number of respondents	Time to respond to telephone survey (hrs)	Time to complete written response (hrs)	Total respondent burden (hrs)	Estimated avg. hourly wage of respon- dents during survey (\$/hr)	Estimated total respon- dent burden in dollar terms
	\1\	\2\	(hrs) \2\		\3\	
Wave 1:						
<b>PrintSTEP</b> printer.....	160	0.25	1.00	200	25.00	5,000
Comparison printer.....	160	0.25	2.75	480	25.00	12,000
Wave 2:						
<b>PrintSTEP</b> printer.....	160	0.25	1.00	200	25.00	5,000
Comparison printer.....	160	0.25	2.75	480	25.00	12,000
Wave 3:						
<b>PrintSTEP</b> printer.....	160	0.25	1.00	200	25.00	5,000
Comparison printer.....	160	0.25	2.75	480	25.00	12,000
Community member.....	50	0.25	0.00	13	0.00	0
Total for all 3 waves.....				2053		51,000

\1\ Based on estimated number of participants provided by pilot states with the breakdown as follows: 60, 60, and 40 participants expected in MO, NH, and MN, respectively.

\2\ Based on preliminary testing of the survey instruments by Abt Associates.

\3\ Based on Screenprinting and Graphic Imaging Association International's 1999 Wage Survey.

Estimated Recordkeeping and Reporting Cost Burden on Respondents

The **PrintSTEP** evaluation utilizes telephone interviews and written data collection forms to collect all the data necessary from the respondent. The only cost to the respondents resulting from this survey is their time, which is covered in the section above. There are no other costs to the respondents and this section, therefore, is not applicable.

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

Dated: February 24, 2000.

Michael M. Stahl,

Director, Office of Compliance.

[FR Doc. 00-5627 Filed 3-13-00; 8:45 am]

BILLING CODE 6560-50-P



## **Appendix F:**

### **Fax-back Form for Cost Information**

## FAX-BACK FORM ON COST INFORMATION

We would like to identify the costs associated with the various aspects of your PrintSTEP notification/agreement process or your standard environmental permit. We are interested in costs of all kinds, including the time your staff spent, the cost of consultants, buying advertising or printing informational materials, and so forth. Please respond by saying what type(s) of staff were involved and how much time they spent (in hours or days) on the following activities. Also specify what other expenses you incurred (type and amount).

ACTIVITY	LABOR HOURS			DIRECT COSTS	
	MANAGER	TECHNICAL	CLERICAL	TYPE	AMOUNT
preparation of regulatory applications/filings (i.e., PrintSTEP application for participants and permit applications for non-participants)					
follow-up with regulatory agency regarding status, approval, etc. of application/permit					
notification (e.g., creating and running an advertisement, sending out a mailing about an event, having a sign made, etc.)					
completing the environmental regulatory forms required when modifying your process (e.g., adding a new press)					
reviewing and responding to comments					
preparing for and attending public meetings					
follow-up from public meetings (e.g. developing a CIP)					

## **Appendix G:**

### **Report Outline**

REPORT OUTLINE  
**Environmental Impacts, Administrative Impacts, and Stakeholders' Views**  
November 11,1999

Outline Part 1: Environmental Impacts

***Hypothesis #\_***

***Emissions, wastes and discharges from printing (both overall and for each medium) have decreased.***

Specific pollutants or indicators in wastewater have decreased.

Pounds or gallons of total hazardous waste generated have been reduced.

Degree of opportunity of materials to be exposed to storm water has been reduced.

**Table \_\_\_\_: Changes in Waste Water/Storm Water**

Flow	PrintSTEP Printers			Non-PrintSTEP printers		
	pre	post	% change <sup>a</sup>	pre	post	% change <sup>a</sup>
Water use (gal/year)						
Waste water discharge (gal/year)						
Number discharging to septic						
Number requiring a storm water permit						
Number of Exposures checked on the Storm Water Checklist (for facilities with storm water permits only)						

<sup>a</sup> Changes will be normalized for each facility's change in production. For example, if a printer's production decreases and their water use decreases proportionally, this would not be reflected as a reduction on this table.

Data Source: Application form for PrintSTEP printers, and equivalent for non-participants.

**Table \_\_\_\_: Changes in Hazardous Waste Generation**

Hazardous Waste Generation	PrintSTEP Printers			Non-PrintSTEP printers		
	pre	post	% change <sup>a</sup>	pre	post	% change <sup>a</sup>
Average hazardous waste generated over the last year (lbs) per facility						

Number of Large Quantity Generators						
Number of Small Quantity Generators						
Number Conditionally Exempt						
Number not generating haz. waste						

<sup>a</sup> Changes will be normalized for each facility's change in production.

Data Source: Application form for PrintSTEP printers, and equivalent for non-participants.

**Table \_\_\_\_: Changes in Air Emissions**

Use of:	PrintSTEP Printers			Non-PrintSTEP printers		
	pre	post	% change <sup>a</sup>	pre	post	% change <sup>a</sup>
Average VOC-containing materials (lbs) per facility ( <i>per Worksheet</i> ) <sup>b</sup>						
Average HAP-containing materials (lbs) per facility ( <i>per Worksheet</i> ) <sup>b</sup>						
Average PrintSTEP Air Level						
% of facilities that reduced their PrintSTEP Air Level during the pilot						

<sup>a</sup> Changes will be normalized for each facility's change in production.

<sup>b</sup> Information on VOC- and HAP-containing materials will come from printers' Material Use or Emissions Worksheets.

Data Source: Material Use or Emissions Worksheet from the PrintSTEP application form for PrintSTEP printers, and equivalent for non-participants.

***Hypothesis #\_***

***Printers' use of specific pollution prevention practices has increased.***

Has there been an increase in the use of pollution prevention practices as a result of PrintSTEP?

Is there a difference in the pollution prevention practices of printers who volunteered for PrintSTEP than of those who didn't?

Over the past 2 years have you:	PrintSTEP Printers			non-PrintSTEP printers		
	pre	post	change	pre	post	change
Investigated the use of digital pre-press applications?						
Eliminated chrome based cleaners?						
Installed silver recovery units?						
Properly maintained silver recovery units?						
Properly maintained film and plate processing units (e.g., flow rates, squeegees, secondary containment, holding tanks and pipes/tubing)?						
Utilized Code of Silver Practices steps to recover silver from film fixers?						
Investigated use of developer and fixer recycling units for film processors?						
Investigated use of low replenishing rate film chemistry?						
Investigated use of washwater recycling units for film and plate processors?						
Investigated use of digital, dry, or water-based proofing systems?						
Instituted an ink inventory system to reduce waste ink disposal costs?						
Instituted a switch to low VOC ink systems, such as UV curable, waterbased technology or vegetable based ink systems?						
Investigated the use of stay open and cartridge ink delivery system for sheetfed offset lithographic inks?						

Over the past 2 years have you:	PrintSTEP Printers			non-PrintSTEP printers		
	pre	post	change	pre	post	change
Used chiller re-circulators to lower temperature of fountain solutions to reduce evaporation and lower air emissions?						
Instituted a switch to isopropyl alcohol free fountain solutions or reduced concentration of isopropyl alcohol in fountain solution?						
Investigated the installation of filtration system for fountain solution recirculation system?						
Switched to low vapor pressure or low VOC cleaning solvents (less than 10 mm Hg at 20 degrees Celsius) to reduce air emissions and quantity of solvent purchased?						
Eliminated the use of f-listed solvents and substituted d-listed or nonhazardous solvents to reduce the toxicity of hazardous waste generated?						
Instituted a solvent recycling/reuse system?						
Implemented a shop towel management? policy so that soiled wipers are stored in closed or covered safety containers to reduce air emissions?						
Instituted a program to recover free liquids from shop towels either on-site or off-site;(i.e., gravity draining via false bottom collection drums, hand wringers, centrifuges, etc.)?						
Implemented a solid waste/recycling program by recycling all possible items from your solid waste stream?						
Reused and recycled pallets and skids to reduce solid waste?						
Collected and recycled used oil, other lubricants, and batteries?						
Recycled parts washing fluids?						
Implemented a program to manage and recycle spent fluorescent and high intensity discharge lamps?						
Where possible, used low solvent, no solvent-based, or water-based adhesives and glues?						

Over the past 2 years have you:	PrintSTEP Printers			non-PrintSTEP printers		
	pre	post	change	pre	post	change
Where possible, used low solvent, or water-based ink jet inks?						
Requested vendor take back all samples not consumed?						
Used first in first out inventory control system?						
Covered all open containers of liquids and kept them closed?						
Stored all materials to minimize damage due to mishandling or accidents?						

<sup>a</sup> Sample list of pollution prevention practices; final list to be determined.

Data Source: Printer survey (or printer application form for PrintSTEP printers, and equivalent for non-participants)

## Outline Part 2A: Administrative Impacts/State Government

### ***Hypothesis #\_***

#### ***States can administer PrintSTEP as a multi-media program.***

Does a recognizable cross-program infrastructure exist that functions for all media?

Does the agency coordinate effectively across media and up through the organization?

Do you feel you are able to be more efficient at permitting printers?

Is there a single point of contact at the agency for all media/PrintSTEP questions?

Has this person been accessible?

Did the coordination speed or slow the process?

### **For specific states:**

To what extent does the state possess the following characteristics:

- recognizable cross-program infrastructure
- efficient permitting/approval process
- effective coordination among different program staff
- clear understanding of roles and responsibilities
- single point of contact for cross-media questions
- ease of access to this person
- ability of this person to adequately answer multi-media questions



- effect of coordination in terms of speeding or slowing the process

Did this characteristic exist before PrintSTEP?

If not, does it exist now as a result of PrintSTEP?

In states where PrintSTEP is not implemented throughout the state, are these things recognized outside of the pilot area?

To what extent are each of these characteristics recognizable to the printer?

**Summary findings of all states together:**

Data source: interviews with state personnel and printers' survey

**Hypothesis #\_**

***PrintSTEP reduces the total amount of time between initial application and final Agreement (compared to the multiple applications under the original system).***

**Note: this outcome only applies to currently permitted facilities.**

How much time did it take between initial application and final approval for each individual permit under the traditional system?

How much time did it take between initial application and final approval for a PrintSTEP Agreement?

**Table \_ : Time elapsed between initial submittal of standard permit/PrintSTEP Application and completion (final approval or denial(?))**

% of printers for which process took:	PrintSTEP Application	Standard permit application (all media totaled)
0-2 weeks		
2-4 weeks		
4-6 weeks		
6-8 weeks		
8-12 weeks		
12-16 weeks		
more than 16 weeks		

Data source: **State records and state interviews (or printers' questionnaire?)**

***Hypothesis #\_***

***Printers have a better understanding of their regulatory requirements under PrintSTEP.***

Has PrintSTEP improved your understanding of your regulatory requirements?

Did PrintSTEP improve printers' ability to achieve compliance?

**Table \_\_: Percent of printers who feel they have a good understanding of their regulatory requirements.\***

	PrintSTEP participants		non-participants	
	pre	post	pre	post
air				
storm water				
waste water				
hazardous waste				

\* Printers were asked to rate their level of understanding on a four-point scale of "very well," "fairly well," "not very well," and "poor." Here we report only the responses "very well" or "fairly well" as a positive assessment.

Data source: printers' survey.

***Hypothesis #\_***

***PrintSTEP increases printers' ability to respond to business opportunities.***

Have environmental requirements (e.g., a change to a permit or other approval from the local, state, or federal government) affected you in terms of your ability to respond to business opportunities (e.g., installing a new piece of equipment; meeting the request of a customer/potential customer for a different ink, coating, etc.; increasing production; bringing out-sourced operations in-house) in the past \_\_\_\_ years? In what way? How big was the impact?

*(Anecdotal responses)*

***Hypothesis #\_\_***

***Stakeholders view the PrintSTEP (public involvement) process as beneficial***

\*(some overlap here with questions on the Public Involvement outline. This table should probably go in that section.)\*

Were all participants satisfied with the information and assistance provided?

Were all aspects of PrintSTEP available and accessible?

Which aspects of PrintSTEP were most/least available and accessible?

**Table \_\_: Printers' Satisfaction with Information/Assistance Provided, by Source**

	Very satisfied	Somewhat satisfied	Somewhat unsatisfied	Very unsatisfied	N/A	Composite score**
Public Meeting(s) for <u>your</u> PrintSTEP Application						
Technical Assistance Center						
Repository						
State Contact						
Other source						
Overall Satisfaction with PrintSTEP Information						

\* Printers were asked to rate each of three aspects of the public meetings on a four-point scale: very satisfied, somewhat satisfied, somewhat unsatisfied, and very unsatisfied.

\*\* Each response was assigned points according to the following scheme: very satisfied = +2, somewhat satisfied = +1, somewhat unsatisfied = -1, and very unsatisfied = -2.

## Outline Part 3: Stakeholders' Views of PrintSTEP

*Hypothesis #\_\_*

*PrintSTEP documents were useful to stakeholders*

Was the PrintSTEP *State Guide* helpful to states in administering the program?

Was the *Plain Language Workbook* helpful to printers in implementing pollution prevention?

Were the PrintSTEP documents helpful in finding a technical assistance provider?

**Table \_\_: Percent of respondents who said the PrintSTEP Documents were useful for the following things**

	PrintSTEP Printers	Community Members	State government officials
explaining the PrintSTEP process			
understanding regulatory requirements			
aiding community involvement			
finding technical assistance providers			
assisting pollution prevention implementation			
finding other resources			
understanding/completing the PrintSTEP Application			
other			

Data source: Printer survey, community member survey, interviews with state staff.

***Hypothesis #\_***

***Stakeholders view the PrintSTEP process as beneficial overall***

Would you participate in a similar program again?

What recommendations do you have to improve the program?

What future benefits do you see from the increased communication?

Anecdotal responses, plus:

**Table \_\_\_\_: Stakeholder Satisfaction with the PrintSTEP Process Overall\***

	Very satisfied	Somewhat satisfied	Somewhat unsatisfied	Very unsatisfied	Composite score**
Printers					
Community members					
State staff					

\* Stakeholders were asked to rate the process on a four-point scale: very satisfied, somewhat satisfied, somewhat unsatisfied, and very unsatisfied.

\*\* Each response was assigned points according to the following scheme: very satisfied = +2, somewhat satisfied = +1, somewhat unsatisfied = -1, and very unsatisfied = -2.

Data source: Printer survey, community member survey, interviews with state staff.